

Timothy M. Stubson, WSB #6-3144
Crowley Fleck PLLP
111 West 2nd St. Suite 220
Casper, WY 82601
(307) 265-2279
tstubson@crowleyfleck.com

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

**MOTION TO STAY
ANSWER DEADLINE**

COMES NOW Defendant, David Chen, by and through his counsel Crowley Fleck, PLLP and presents the following motion to stay.

Plaintiff filed the above-captioned matter on September 30, 2024. Contemporaneously herewith the Defendant has filed his Motion to Transfer pursuant to 28 USC § 1404(a). Defendant resides and was served outside the District of Wyoming and therefore has until November 29, 2024 to respond to the Complaint.

Defendant anticipates raising significant issues related to the propriety and viability of a number of the claims raised in Plaintiff's complaint. Defendant believes that judicial economy and the interests of justice would be served by staying the response to the Complaint in order to

ensure that the Court with the ultimate authority over this matter evaluate and address the responsive pleadings in this matter.

WHEREFORE Defendant prays for a stay of the Answer date until such time as the court decides the pending motion to transfer.

Dated this 12th day of November, 2024.

CROWLEY FLECK PLLP

/s/ Timothy M. Stubson

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Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on the 12th day of November, 2024, via ECF Electronic filing to the following:

Amy Iberlin
Williams Porter Day & Neville, PC
P.O. Box 10700
Casper, WY 82602
aiberlin@wpdn.net

/s/ Timothy M. Stubson

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